

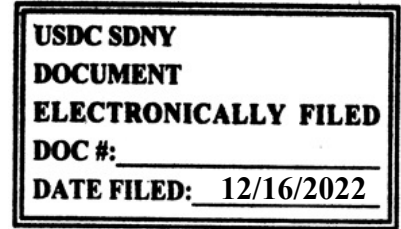
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December 16, 2022

Via ECF

Katharine H. Parker, U.S.M.J.
United States District Court, Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Rene v. 31 East 21 Express Inc.*
Case No.: 1:21-cv-07435-JGK



MEMO ENDORSED

Dear Honorable Magistrate Judge Parker:

This law firm represents Defendants Pun San Laan Inc. (the “Corporate Defendant”) and Thanaphan Laonutwuttikul (the “Individual Defendant”, and together with the Corporate Defendant, the “Nana Thai Defendants”, or “Nana Thai”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules I(b) and I(c), this letter respectfully serves to request an adjournment of the settlement conference currently scheduled for January 10, 2023, to a date and time after January 31, 2023.

This is the fourth request of its nature, and is made on consent of counsel for Plaintiff Claudio Rene (the “Plaintiff”).

The basis for this request is that the Corporate Defendant’s representative will be traveling internationally through and including January 31, 2023, and thus, will not be available to attend the January 10, 2023 settlement conference.

This letter also respectfully serves to advise the Court that the parties have, and are continuing to, meet-and-confer in advance of the scheduled settlement conference about any remaining discovery needed to inform their settlement positions.

In light of the upcoming holidays, and the Corporate Defendant’s representative unavailability, an adjournment of the January 10, 2023 settlement conference is appropriate to a date and time set by the Court after January 31, 2023.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel

APPLICATION GRANTED: The settlement conference in this matter scheduled for Tuesday, January 10, 2023 at 2:00 p.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to **Monday, February 13, 2023 at 2:00 p.m.** Parties must attend in-person with their counsel. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than **February 6, 2023 by 5:00 p.m.**

APPLICATION GRANTED

A handwritten signature in black ink, appearing to read "Katharine H. Parker", written over a horizontal line.

Hon. Katharine H. Parker, U.S.M.J.

12/16/2022